

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:) Chapter 7
)
)
BLACKBIRD HOLDINGS, INC.) Case No. 10-33405
)
Debtor.)

OBJECTION TO MOTION TO ABANDON INTEREST IN SUBSIDIARIES

Aurora, LLC (“Aurora”), a creditor of Blackbird Holdings, Inc. (the “Debtor”) and a party in interest in this case, pursuant to 11 U.S.C. hereby objects to the Trustee’s Motion to Abandon Interest in Blackbird Holdings, Inc. Subsidiaries (Doc# 114) (the “Motion”). In support of its Objection, Aurora respectfully shows the Court as follows:

1. The Debtor is the parent company of the subsidiaries known as Blackbird Japan, Blackbird America Inc., and Blackbird Asia Ltd. (the “Subsidiaries”).
2. Aurora objects to the Motion on the grounds that Aurora has expressed an interest in acquiring the assets proposed to be abandoned.

WHEREFORE, Aurora requests the Court to deny the Motion and for such other relief as the Court deems just and proper.

This 12th day of October, 2011.

MOON WRIGHT & HOUSTON, PLLC

/s/ Travis W. Moon
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Counsel for Aurora, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **OBJECTION TO MOTION TO ABANDON INTEREST IN SUBSIDIARIES** was served by electronic notification on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case.

Dated: Charlotte, North Carolina
October 12, 2011

MOON WRIGHT & HOUSTON, PLLC

/s/ Travis W. Moon

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